

Hon. Richard A. Jones
Noted for Consideration
June 8, 2023

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

KURT BENSHOOF,
A.R.W. by and through his father
KURT BENSHOOF,

Petitioners,

vs.

DAVID KEENAN, ADRIAN DIAZ,
JESSICA OWEN,

Respondents.

No. 2:23-cv-00751-RAJ

DECLARATION OF PEGGY WU IN
SUPPORT OF RESPONDENT JUDGE
KEENAN'S OPPOSITION TO
PETITIONER'S REQUEST FOR AN
EMERGENCY RESTRAINING
ORDER

I, Peggy Wu, declare as follows:

1. I am over the age of 18 and competent to testify in this matter. I make this declaration based on my personal knowledge.
2. I am a Deputy Prosecuting Attorney with the Civil Division of the King County Prosecuting Attorney's Office and the counsel of record for Respondent Judge David Keenan.
3. Attached hereto as ***Exhibit A*** is a true and correct copy of the Final Parentage Order signed by Judge David Keenan and filed on October 21, 2022 in King County Superior Court cause #21-5-00680-6 SEA. The dates of birth and the name of the minor child were redacted to comply with LCR 5.2(a)(1) & (2).

DECLARATION OF PEGGY WU - 1

Leesa Manion (she/her), Prosecuting Attorney
CIVIL DIVISION
701 5th Avenue, Suite 600
Seattle, WA 98104
(206) 477-1120 Fax (206) 296-0191

1 4. Attached hereto as **Exhibit B** is a true and correct copy of the Findings of Fact
2 and Conclusions About Parentage signed by Judge David Keenan and filed on October 21, 2022
3 in King County Superior Court cause #21-5-00680-6 SEA. The dates of birth and the name of
4 the minor child were redacted to comply with LCR 5.2(a)(1) & (2).

5 5. Attached hereto as **Exhibit C** is a true and correct copy of the Restraining Order
6 signed by Judge David Keenan and filed on October 21, 2022 in King County Superior Court
7 cause #21-5-00680-6 SEA. The dates of birth and the name of the minor child were redacted to
8 comply with LCR 5.2(a)(1) & (2).

9 6. Attached hereto as **Exhibit D** is a true and correct copy of the Order Denying
10 Respondent's Motion to Vacate signed by Judge Sean O'Donnell and filed on March 24, 2023 in
11 King County Superior Court cause #21-5-00680-6 SEA.

12 7. Attached hereto as **Exhibit E** is a true and correct copy of the Order on Writ of
13 Habeas Corpus signed by Judge Steve Rosen and filed on July 21, 2022 in King County Superior
14 Court cause #22-2-11112-7 SEA.

15 8. Attached hereto as **Exhibit F** is a true and correct copy of the Order Granting
16 Defendants' Joint Motion for a Vexatious Litigant Order Against Plaintiff, and Temporary Order
17 Restricting Abusive Litigation by Kurt Benshoof signed by Judge Marshall Ferguson and filed
18 on March 6, 2023 in King County Superior Court cause #22-2-15958-8 SEA.

19 9. Attached hereto as **Exhibit G** is a true and correct copy of the Order Restricting
20 Abusive Litigation by Kurt Benshoof signed by Judge Marshall Ferguson and filed on March 31,
21 2023 in King County Superior Court cause #22-2-15958-8 SEA.

1 I declare under the penalty of perjury under the laws of the State of Washington that the
2 forgoing is true and correct to the best of my knowledge.

3 Dated this 12th day of June, 2023 in Issaquah, Washington.

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6 Peggy Wu
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